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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**AGI, INC.
MELROSE PARK, IL
ILD 047 580 006**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 047 580 006
Date Prepared	:	March 1, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL2A
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EXECUTIVE SUMMARY

B&V Waste Science and Technology Corp. (BVWST), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the AGI Inc. (AGI), facility in Melrose Park, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The AGI facility manufactures folding cartons, primarily for record, compact disc, and cassette tape covers and cosmetic product packaging. The facility generates and manages the following waste streams: paper (non-hazardous), ink (D001), water/alcohol mixture (D001), lubricating oil (D001), press "washups" (D001), still bottoms (D001), water-based coatings (D001), ultra-violet coatings (D001), and adhesives (D001).

AGI, now owned by Ruby North Partnership who purchased AGI in a leveraged buy-out in 1987, purchased the facility in 1971 from the Baungarten Calendar Co. Baungarten had operated at the site since 1958. The facility occupies approximately six acres in an industrial area and employs about 360 people.

The facility's regulatory status is that of a large-quantity generator and a treatment/storage/disposal (TSD) facility. AGI does not currently store hazardous wastes for longer than 90 days and has hired Environmental Risk Consultants Inc. to compile a closure plan for submittal to Illinois Environmental Protection Agency (IEPA), terminating the facility status as a TSD facility.

The PA/VSI identified the following nine SWMUs and no AOCs at the facility:

Solid Waste Management Units

1. Waste Paper Collection Area
2. Paper Waste Storage Room
3. Waste Ink Satellite Accumulation Area
4. Printing Press Satellite Accumulation Areas
5. Press "Washups" Satellite Accumulation Area
6. Waste Coatings Satellite Accumulation Area
7. Waste Glue Satellite Accumulation Area

8. Drum Storage Pad
9. Still Bottoms Satellite Accumulation Area

Facility access is controlled by keeping all doors locked and screening all visitors at the front entrance. There is no formal security system. Except for a 25-square-foot enclosure for raw materials on the west side, the facility is not fenced.

The nearest surface-water body, Silver Creek, is a half mile east of the facility and is used for industrial purposes. The Des Plaines River is approximately two miles east of the facility.

Ground water is not used as a drinking water supply. The nearest source currently used for drinking water is Lake Michigan, located approximately 13 miles east of the facility. However, ground water is maintained as a backup source of drinking water for DuPage County, located 4 miles west of the facility.

Sensitive environments are not located on site. There are no wetlands, sensitive habitats, or national/state parks within two miles of the facility.

Since 1980, AGI has had no documented releases to ground water, surface water, air, or on-site soil.

Solid Waste Management Units 1 through 7 and 9 have low potential for release to ground water, surface water, air, and on-site soils. They are located indoors and have controls to prevent leakage.

Open cans of waste ink (D001) are allowed to accumulate on the floor next to SWMU 3 and an open drum of press "washups" was observed in SWMU 5. BVWST recommends containers of waste be maintained closed, except when necessary to add or remove waste.

The asphalt Drum Storage Pad (SWMU 8) has no dikes or fencing. No release control equipment such as squeegees, shovels, or fire extinguishers are maintained outdoors by the pad. No part of the drum storage pad is located the minimum 50 feet from the property boundary required by 40 CFR, Part 265, Subpart I for ignitable or reactive waste.

BVWST recommends that drums be stored in accordance with 40 CFR Part 265, Subpart I, or an approved variance. AGI consultants, Environmental Risk Consultants Inc., are preparing a request for a variance, to be allowed to store drums in this area.

The asphalt Drum Storage Pad (SWMU 8) has a moderate potential for release to the ground water and on-site soil. The Drum Storage Pad is used to store all of the wastes generated at the facility. Located in the northern half of the western border of the facility, this unit is upgradient on the slope that leads to the railroad tracks west of the facility. During a recent inspection, the IEPA found 26 drums of an unknown substance on the Drum Storage Pad. IEPA required these drums to be overpacked, which AGI did. Many of the drums were uncovered, substances may have leaked while these drums were left outside. Because there is a possibility of contamination to the soil under and around the Drum Storage Pad, BVWST recommends soil sampling on the sloped area of the pad (SWMU 8) and of the soil next to the railroad tracks.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PAs) and visual site inspections (VSIs) of hazardous waste treatment and storage facilities in Region 5. B&V Waste Science and Technology Corp. (BVWST), TES 9 team member, was tasked by PRC to conduct the PA/VSI for the AGI Inc. (AGI) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMUs) and areas of concern (AOCs).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic

basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA included review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the AGI facility in Melrose Park, Illinois. The PA was completed on December 9, 1991. BVWST gathered and reviewed information from the facility files and personnel, the Illinois Environmental Protection Agency (IEPA), Metropolitan Water Reclamation District of Greater Chicago (MWRDGC), EPA Region 5

RCRA files, as well as flood plain maps (FEMA, 1984) and Illinois State Geological Survey Circulars 178, 542, 406 and 460. The VSI was conducted on December 10, 1991. It included interviews with three facility representatives and a walk-through inspection of the facility. Nine SWMUs and no AOCs were identified at the facility.

BVWST completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. Attachment B includes a VSI summary and 14 inspection photographs. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The AGI facility is located at 1950 N. Ruby Street in Melrose Park, Cook County, Illinois (latitude 41° 54' 30" N and longitude 87° 52' 30" W), as shown in Figure 1. The facility occupies approximately six acres in an industrial area.

The AGI facility is bordered on the north by the Temperature and Equipment Corp. Behind the building is a railroad spur, approximately 25 to 30 feet west. South of the drum storage pad, the railroad spur curves east and enters the facility warehouse. This railroad spur is no longer used. West of the railroad is Golden Dipt, which fronts on Hawthorne Avenue. On the south is North Avenue, on the southeast is Indian Boundary Road, and on the east is Lindberg Heat Treating across Ruby Street.

The facility consists of five one-story buildings covering 260,000 square feet of work space. A common roof with internal brick walls covers all five buildings. The facility has four underground storage tanks which were successfully abandoned in place in accordance with applicable local, state, and federal regulations (ERC, 1991). The facility has one employee parking area along the northern end of the building.

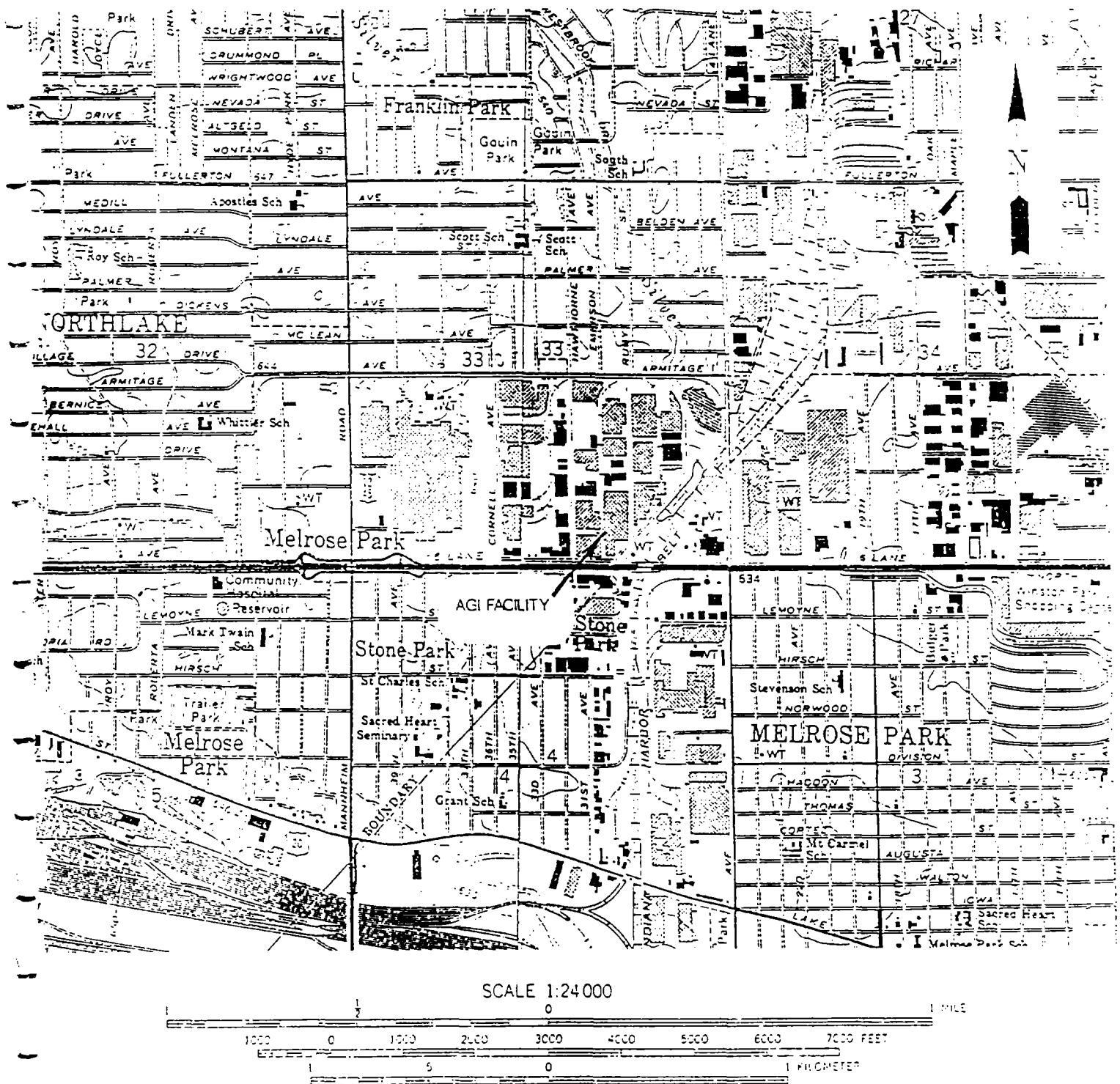
2.2 FACILITY OPERATIONS

The AGI facility manufactures folding cartons, primarily for record, compact disc, and cassette tape covers and cosmetic product packaging. AGI has operated at its current location since 1971, employing about 360 people. During the past decade AGI has experienced rapid growth and changed its regulatory status from a small-quantity generator to a large-quantity generator.

AGI
Melrose Park, Illinois

PA/VS

FIGURE 1
FACILITY LOCATION

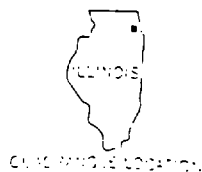


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AND

RIVER FOREST, ILL.

modified from
U. S. GEOLOGICAL SURVEY
1980 and 1978



AGI purchased the facility in 1971 from the Baungarten Calendar Co. Baungarten had operated at the site since 1958, performing the same activities that AGI performs. AGI formally changed its name from Album Graphics Incorporated in 1983. AGI was purchased by Ruby North Partnership in a leveraged buyout in 1987 (Emerson, 1992).

To construct folding cartons, AGI uses six printing presses, five diecutters, and six gluing machines. The major production divisions of the facility include office areas; plate rooms; press rooms; and diecutting, gluing, and storage areas. The primary wastes are non-hazardous paper wastes, and regulated hazardous wastes including inks, glues, and other industrial by-products. All paper is baled and sold for recycling. All hazardous wastes are stored in 55-gallon drums on an asphalt pad outside, on the western edge of the building, then sold to Safety-Kleen Corporation for use as secondary fuels. The nature and utilization of each solid waste management unit is identified in Table 1. Their locations within the facility are shown in Figure 2.

The carton manufacturing process begins with the creation of printing plates that correspond to each of the colors used in a carton. The images are created in the drafting room using Mylar and Rubylith paper, and then photographically transferred to the printing plates. The used Mylar and Rubylith paper is discarded to 55-gallon drums. This non-hazardous waste is accumulated at a rate of about four barrels per year (two of each) and is stored in the plate room in the northeast corner of the building. Full barrels are picked up by DuPont of Niles, Illinois for recycling.

The printing plates are mounted into the printing presses. The printing process uses photo-sensitive printing plates which are reused when the production of a carton is complete. No hazardous materials are generated in this process.

Paper is received in rolls and must be cut into sheets of appropriate sizes. Five of the six printing presses are fed sheets of paper; the sixth printing press is roll-fed. As paper moves under the rollers of the printing press, color is applied by using the printing plate corresponding to each color. When all colors have been applied, most sheets receive a high-gloss coating which is also applied by the press and dried by ultraviolet light. The printed, coated, and dried sheets or rolls are collected at the end of the press.

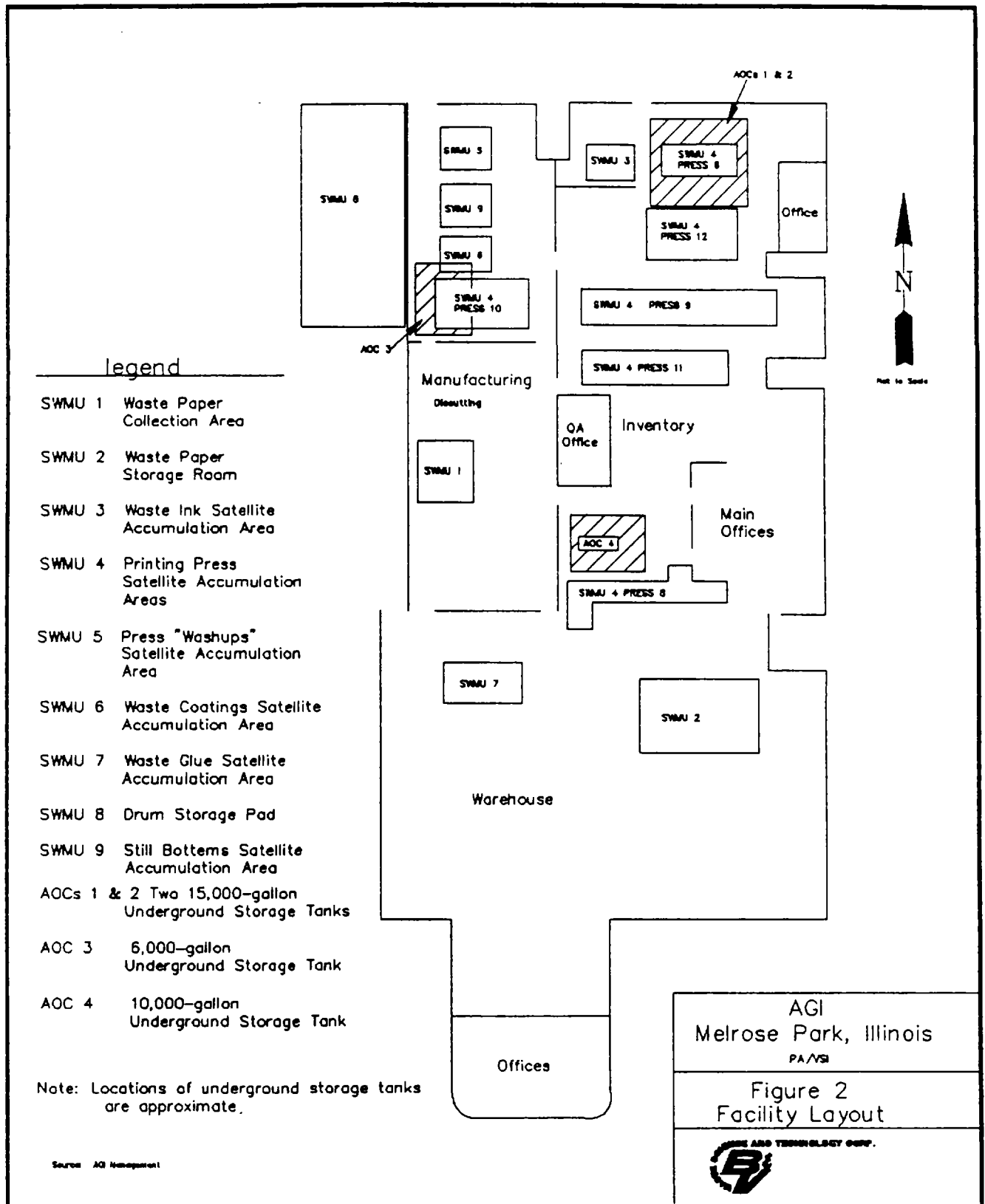
TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMUs)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Waste Paper Collection Area	No	Active
2	Paper Waste Storage Room	No	Active
3	Waste Ink Satellite Accumulation Area	No	Active
4	Printing Press Satellite Accumulation Areas	No	Active
5	Press 'Washups' Satellite Accumulation Area	No	Active
6	Waste Coatings Satellite Accumulation Area	No	Active
7	Waste Glue Satellite Accumulation Area	No	Active
8	Drum Storage Pad	Yes	Active**
9	Still Bottoms Satellite Accumulation Area	No	Active

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

** Personnel at the AGI facility have stated wastes are stored for less than 90 days, however, generation rates and quantities on site, recorded during an IEPA inspection (IEPA, 1991) indicate storage time exceeds 90 days.



Ink is applied to the printing plates using several steps. Printing ink is delivered onto rollers at the top of the press. As each roller turns, ink is transferred to the next roller by gravity-feed. The bottom roller, which contains an evenly distributed layer of ink, transfers the printing ink to the printing plate. The plate has been treated so that ink adheres only to that part of the plate corresponding to the image to be transferred to paper. As the printing plate rotates, it is continuously treated with a solution of ethanol and water (fountain solution) to remove adherent ink from areas not corresponding with the image. The ink from the printing plate is transferred to another roller beneath the printing plate. This roller receives a mirror image of the desired graphic. The image is transferred onto the paper as the roll or sheet of paper passes beneath this roller.

Each printing press contains six printing plates. These plates contain images corresponding with six different colors on the final graphic. When all colors have been transferred onto paper, the sheet or roll receives a layer of high gloss or ultraviolet (UV) coating. The coating is applied to a rotating "blanket" which transfers a thin layer to the paper. The paper then passes beneath an ultraviolet lamp which affixes and dries all paints and the coating. The printed paper is either stacked or rerolled at the end of the press.

The printed paper is moved to the diecutting room where sheets of paper containing multiple images are diecut to create individual packaging units. The diecutters also create creases on the cartons to ensure that when they are folded, the edges are formed at the right places. This process creates a large quantity of paper scrap. Not all of the printed sheet is used for the cartons. The excess paper is punched out and collected on the floor around the diecutters.

The diecut carton units are aligned single file on the gluing machines. The machines apply glue to the appropriate tabs and fold the paper so that a completely folded and glued carton is produced. The cartons are moved into the storage rooms until they are shipped to clients.

2.3 WASTE GENERATING PROCESSES

The primary waste streams generated at the AGI facility are: paper (non-hazardous), ink (D001), water/alcohol mixture (D001), lubricating oil (D001), press "washups" (D001), still bottoms (D001), water-based coatings (D001), ultra-violet coatings (D001), and adhesives (D001). These wastes are generated during the production of record, compact disc, and cassette tape covers or cosmetic product packing.

AGI has not changed the basic materials in its waste streams since the plant's purchase in 1971. Though some of the printing presses have been moved, their waste water/alcohol mixture, and ink waste receptacles, and quality assurance pullout pallets moved with them. AGI has instituted the use of a distillation process which allows the recycling of some water/alcohol printing press cleaning solution with subsequent volume reduction of that waste stream.

All wastes generated at AGI, except for waste paper, are eventually transported to the Drum Storage Pad (SWMU 8) for storage, pending collection by Safety-Kleen Corp. Since 1989, full 55-gallon drums of waste ink, water/alcohol solution, still bottoms, press "washups", coatings, and glue are collected at least every 90 days by Safety-Kleen Corp., Elgin, Illinois for use as secondary fuels. From 1986 to 1989, Pollution Control Industries, Inc. collected the waste. Facility representatives indicated that they do not know who removed the wastes off site prior to 1986 or how the waste was managed prior to 1980. SWMU 8 is located outside of the building on an asphalt surface against the west wall of the facility. Wastes generated at the facility are discussed below and summarized in Table 2. Generation rates presented are based on 1990 waste generation data.

2.3.1 Printing

The printing inks used at the facility are bought in sealed containers and stored at the facility until they are needed. About 95% of the inks are UV-reactive inks and contain no solvent. The remaining 5% are conventional oil-based inks containing solvents. Both types of waste ink are handled the same. Waste ink is generated as excess during production, or when ink becomes contaminated. Waste inks (D001) are taken to the Waste Ink satellite accumulation area (SAA) (SWMU 3), located at the northern edge of the printing room. A 55-gallon drum is kept at this location to receive the small quantities of ink wastes generated elsewhere. When a drum is filled it is moved out of this SAA to the Drum Storage Pad (SWMU 8) at the back of the facility. In 1990, 900 gallons of waste ink were generated in this manner.

2.3.2 Printing Plate Cleaning and Distillation

As described in Section 2.2, Facility Operations, a water/alcohol solution (fountain solution) is used to continuously clean the printing plates during operation. The solution is mixed at the facility from bulk alcohols and city water.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit*</u>
Paper Waste (Non-Hazardous)	Die Cutters	SWMUs 1, 2
Quality Assurance Pullouts (Non-Hazardous)	Printing Presses	SWMUs 1, 2, 4
Waste Ink/D001	Printing Presses	SWMUs 3, 8
Waste Water/Alcohol Mixture/D001	Printing Presses	SWMUs 4, 8
Waste Lubricating Oil/D001	Printing Presses	SWMUs 4, 8
Antifreeze Waste	Printing Presses	SWMU 8
Press Washups/D001	Printing Press Cleaning	SWMUs 4, 5, 8
Still Bottoms/D001	Solvent Recovery Still	SWMUs 8, 9
Waste Coatings/D001	Printing Presses	SWMUs 6, 8
Waste Glue/D001	Gluing Machines	SWMUs 7, 8
Unknown Waste	Unknown	SWMU 8

* Primary management unit refers to a SWMU that currently manages or formerly managed the waste.

Waste water/alcohol solution (D001) is generated in two separate ways. The first occurs during daily operation as the printing plates are continuously rinsed to remove ink adhering to areas not corresponding with the image, or when a color or pattern is changed in the printing press. Waste water/alcohol solution generated throughout the day is collected in a 55-gallon drum in the Printing Press SAA (SWMU 4). SWMU 4 is actually a collective term for the drum stations located by each of the six printing presses. When a 55-gallon drum is filled it is moved to the Drum Storage Pad (SWMU 8).

Waste water/alcohol solution is also generated every week when the waste water/alcohol mixture is drained from the presses regardless of color changes. The waste water/alcohol solution drained from the press into a 55-gallon drum is moved directly to a solvent recovery still where it is temporarily stored. When several drums are full, the solvent recovery still is used to distill useable water/alcohol mixture from the waste water/alcohol mixture. The AGI facility initiated the internal distillation system in 1991 to reclaim waste water/alcohol solution which was previously discarded as a hazardous waste. Still bottoms are collected in a 55-gallon drum at the Still Bottom SAA (SWMU 9) located by the still. Full drums of still bottoms are transferred to the Drum Storage Pad (SWMU 8) for temporary storage prior to disposal.

In 1990, approximately 9,500 gallons of waste water/alcohol mixture were generated. The annual reduction in waste achieved by distillation cannot be determined because of the short time the solvent recovery still has been in use.

2.3.3 Press Lubrication

Each press also has a five-gallon vessel for the storage of lubricating oil (D001) which continuously runs across the moving parts of the machinery during operating hours. As the lube oil runs out of the press it is collected in a small basin at the base of the press. When this basin is full, it is drained into a 55-gallon drum in the Printing Press SAA (SWMU 4). This drum is also moved to the Drum Storage Area (SWMU 8) when full. In 1990, approximately 500 gallons of lube oil were generated.

2.3.4 Quality Assurance Pullouts

Printed sheets are removed from the production line to ascertain the quality of print produced. These quality assurance sheets are stacked on a pallet next to each press. These QA

sheets are transported to the baling room where they are shredded and baled. The scrap bales are transported to the Paper Waste Storage Room (SWMU 2) located west of the baling room and are stored in groups according to the quality of paper contained in them. All paper is sold to Atlas Recycling in Chicago, Illinois. In 1990, approximately 8.5 million pounds of all types of paper wastes including pullouts were sold for recycling.

2.3.5 Press "Washups"

At the end of each week, and when any press is being changed over to a new product, each printing press goes through a complete cleanup. A mixture called press "washups" is used to remove all production residue from the machinery. The dissolution agents in the mixture are propylene glycol methyl ether (CAS 107-98-2) and dipropylene glycol methyl ether (CAS 34590-94-8). After use, the press "washups" (D001) from all presses except No. 12 are collected in a 55-gallon drum which is stored in the Press "Washups" SAA (SWMU 5), located near the northwest corner of the plant and also referred to as the Chemical Storage Room. Similarly, a drum for press "washups" is maintained in the SAA by press No. 12. Full 55-gallon drums of press "washups" are transferred to the Drum Storage Pad (SWMU 8) for temporary storage prior to disposal. Approximately 500 gallons of press "washups" were generated in this manner in 1990.

2.3.6 Paper Coatings

Waste Coatings (D001) are generated when coatings being applied to printed sheets become contaminated or when excess coating must be disposed of. A 55-gallon drum for waste coatings is kept at the Waste Coatings SAA (SWMU 6). SWMU 6 is in the corner of the raw materials storage room at the northwest corner of the plant. When a 55-gallon drum becomes full it is transferred to the Drum Storage Pad (SWMU 8). Approximately 600 gallons of waste coatings were generated in this manner in 1990.

The UV coatings are dried under ultraviolet lamps. The ultraviolet lamps are cooled with antifreeze. When the antifreeze level gets low, more is added. Antifreeze waste is not generated on a regular basis but when it is removed, it is drummed and transported to SWMU 8 for pickup by Safety-Kleen Corp.

2.3.7 Diecutting

Paper waste is generated at the diecutting press as full sheets with poor quality print and as small scraps of excess paper. All paper waste is considered non-hazardous. It is transported to the Waste Paper Collection Area (SWMU 1) along the western wall of the diecutting room. Paper waste is kept here for a short amount of time, usually only a shift or two, before it is transferred to the baling room.

Large pieces of paper waste are transported in wheeled carts to the baling room located near the storage rooms at the southeast side of the facility. The small scraps are tossed into a cyclone, a vacuum system that conveys the paper along pipes to the baling room. This room contains a "hogger" which collects the paper waste and shreds it to pieces. The shredded paper is transferred directly to the baler, which automatically turns on, bales, and dispenses the baled paper.

The bales of scrap are transported to the Paper Waste Storage Room (SWMU 2) located west of the baling room and are stored in groups according to the quality of paper contained in them. All paper is sold to Atlas Recycling in Chicago, Illinois. In 1990, approximately 8.5 million pounds of all types of paper wastes including wastes from diecutting were sold for recycling.

2.3.8 Gluing

Waste Glue (D001) is produced when glue becomes contaminated or when it dries in the container and forms a skin on its surface. A 55-gallon drum for waste glue is kept at the Waste Glue SAA (SWMU 7). SWMU 7 is located in the finishing room, south of the gluing machines. When the 55-gallon drum becomes full, it is transferred to the Drum Storage Pad (SWMU 8) for temporary storage prior to disposal. Approximately 700 gallons of waste glue were generated in this manner in 1990.

2.4 HISTORY OF DOCUMENTED RELEASES

A complaint form was filed with the Illinois EPA, Department of Water Pollution Control by an anonymous worker on June 20, 1990. The complainant reported the AGI facility disposes organics and other volatile chemicals (85% volatile) down the sewer (DWPC, 1990). The anonymous worker was instructed to call the hotline 1-800-322-DUMP with any detailed

information he/she might have later on. The complaint was referred to the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) (DWPC, 1990). BVWST contacted Mr. Frank Kelly of the Industrial Waste Department of MWRDGC on March 20, 1992. He could not find reference to this complaint referral in the MWRDGC files.

2.5 REGULATORY HISTORY

2.5.1 RCRA Status

The facility currently operates with interim status as a large-quantity generator storing wastes for less than 90 days. Mr. Stanley E. Wheeler, who was then the facility vice president and plant manager, submitted a notification of hazardous waste activity to EPA on August 8, 1980 (AGI, 1980a) and a RCRA Part A permit application on November 13, 1980 (AGI, 1980b). This application listed 3,300 gallons per year of unspecified waste stored in containers. Illinois EPA licenses 79 26 46 and 79 26 47 were referenced. A reacknowledgement of notification of hazardous waste activity, issued by USEPA, dated September 28, 1981 is included in the AGI file available to BVWST.

In the RCRA Part A permit application, AGI stated they would be a TSD facility. However, they have not kept any waste in storage for more than 90 days since their initial acceptance into the RCRA program in 1980, according statements made by to Mr. Stan Wheeler during the VSI conducted on December 10, 1991. Consequently, AGI has hired Environmental Risk Consultants Inc. of Evanston, Illinois in early 1992, to compile a closure plan for the facility Drum Storage Pad (SWMU 8). A RCRA Part B permit application was not filed by November 8, 1988, consequently the AGI interim status expired November 8, 1992 (Emerson, 1992).

2.5.2 Illinois EPA Status

A representative of the Illinois EPA Department of Land/Noise Pollution Control (DLNPC), conducted an inspection of the AGI facility March 10, 1982, and concluded that AGI did not generate hazardous waste. DLNPC recommended by letter that AGI submit a letter requesting deletion from the hazardous waste facility list (IEPA, 1982). There is no further mention of the issue in the files available to BVWST.

During the IEPA site inspection conducted on October 29, 1991, five apparent violations were observed. The most severe violation was 26 drums of unknown waste behind the plant on the Drum Storage Pad (SWMU 8). In addition, violations included using drums in bad condition, not closing drums, and not providing waste training or refresher courses (IEPA, 1991). The drums of unknown material have been overpacked. According to Mr. Stan Wheeler, drums in good condition are used for storage of waste material, and all drums and areas with drums have been marked.

In waste disposition form, included with the October 29, 1991 inspection report, the following generation rates and on-site amounts are listed (among others):

- Ink waste, one drum generated per month, six drums stored;
- Glue waste, one half drum generated per month, seven drums stored;
- Press "washups" waste, one drum generated per month, eleven drums stored;
- Water-based coating waste, one and a half drums generated per month, eight drums on site; and
- Ultraviolet coating waste, one drum generated per six months, twenty-three drums stored.

2.5.3 Air Permits

The facility has the following air permits for the following units: the Hogger from SWMU 2 - 86050030; SWMU 5 - 86050031. AGI has no history of air permit compliance problems. The facility has no history of odor complaints from area residents.

The AGI facility initiated an internal distillation system in 1991, to reclaim waste water/alcohol solution. During the initial testing phase no permits were required for operation of the still. The distillation is now moving into regular operation and an air permit application has been prepared for AGI by Carlson Consultants Inc. from Springfield, Illinois and submitted to the IEPA (Emerson, 1992). This still should not affect the facility RCRA status.

2.5.4 NPDES Status

The facility has no, and is not required to have, a National Pollutant Discharge Elimination System (NPDES) permit.

2.5.5 MWRDGC Status

The AGI facility is required to report raw product storage, and waste generation and disposal to the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC), a publicly owned treatment works. Raw products are reported on a yearly basis, waste generation and disposal are reported on a monthly basis. This reporting allows the MWRDGC to plan appropriate response to a possible catastrophic event.

On March 21, 1989, a MWRDGC representative conducted an inspection of the AGI facility. As a consequence of this inspection AGI was notified of a reporting violation concerning the generation and disposal of sludge. A conciliation meeting was held May 3, 1989. Reports for the first three months of 1989 were received May 5, 1989. The April 1989 report was received on time. MWRDGC has no further record of reporting from AGI (Kelly, 1992). The initial contact questionnaire from 1989 is not on record, so a questionnaire will be sent. Additionally, AGI was a part of a mass mailing of monthly manifest forms dispatched in March, 1992 (Stuba, 1992). Twelve blank forms were mailed to each facility. One was to be filled out each month and returned to the MWRDGC.

2.5.6 Underground Storage Tank Status

Four underground storage tanks (USTs) are located beneath the concrete slab foundation of the building. The tanks were formerly used for heating oil storage. AGI hired Environmental Risk Consultants Inc. (ERC) to assist in the 1991 in-place abandonment of the USTs. AGI applied to the Office of the State Fire Marshal (OSFM) and received Permit No. 321-91ABN for the abandonment of the tanks. Information presented here is from the ERC draft report.

The northern of two 15,000-gallon USTs located in the northeast corner of the facility, was emptied, cleaned, and internally inspected on October 10 and 11, 1991, by OHM Remediation Service Corporation of Findlay, Ohio (OHM), an ERC subcontractor. OHM observed no indications of corrosion failure. Four soil samples were collected from four 11-foot borings in the

vicinity of the two tanks. The soil was visually inspected and the samples were chemically analyzed for benzene, ethylbenzene, toluene, and xylenes (BETX). None of these possible contaminants were found above detection limits. The tank was filled with inert material consisting of sand, fly ash, concrete, and water on November 25, 1991.

The southern of two 15,000-gallon USTs located in the northeast corner of the facility, was emptied, cleaned, and internally inspected on October 10, and 11, 1991, by OHM. On October 11, 1991, the OSFM tank specialist deemed the tank to be a leaking UST. Information on the closure of the tank is available from the Illinois Emergency Services and Disaster Agency, Incident No. 91-2908 (ESDA, 1991). Four soil samples were collected from four 11-foot borings in the vicinity of the two tanks. The soil was visually inspected and the samples were chemically analyzed for BETX. None of these possible contaminants were found above detection limits. The tank was filled with inert material consisting of sand, fly ash, concrete, and water on November 25, 1991. In March 1992, Illinois EPA (IEPA) sent the facility a letter indicating that the tank was successfully abandoned (IEPA, 1992).

A 6,000-gallon UST, located on the northwest side of the facility, under press 10, was emptied, cleaned, and internally inspected on October 10 and 11, 1991, by OHM. OHM observed no indications of corrosion failure. Three soil samples were collected from three 11-foot borings in the vicinity of the tank. The soil was visually inspected and chemically analyzed for BETX. One sample had a concentration of 2.7 parts per billion toluene. This is below the IEPA's Leaking UST Soil Cleanup Objectives. The tank was filled with inert material consisting of sand, fly ash, concrete, and water on November 25, 1991.

A 10,000-gallon UST, centrally located at the facility, was emptied, cleaned, and internally inspected on October 10 and 11, 1991, by OHM. OHM observed no indications of corrosion failure. Two soil samples were collected from two 11-foot borings in the vicinity of the tank. The soil was visually inspected and the samples were chemically analyzed for BETX. None of these possible contaminants were found above detection limits. The tank was filled with inert material consisting of sand, fly ash, concrete, and water on November 25, 1991.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the AGI facility.

2.6.1 Climate

AGI is located 10 miles west of downtown Chicago, Illinois. Climatic data for the city of Chicago was collected for the last thirty-two years through 1990 by the National Weather Bureau at O'Hare Airport. Average daily maximum temperature is 58.7°F and average daily minimum temperature is 39.7°F. Annual net precipitation averages 33.34 inches, and the greatest twenty-four hour rainfall has been 9.35 inches, recorded in August 1987. The average wind speed is 10.3 mph. The prevailing wind is from the west in winter, from the west and south-southwest in the spring, from the southwest in summer, and from the south-southwest in the fall.

2.6.2 Flood Plain and Surface Water

Surface-water drainage at the facility is generally to the northeast toward Silver Creek. The nearest surface-water body, Silver Creek, is located one-half mile east of the facility and is used for industrial purposes. This surface-water body discharges to Des Plaines River about two miles from the facility.

According to the Federal Emergency Management Agency Flood Insurance Rate Map of Melrose Park (FEMA, 1984), the facility lies within the 100-year flood plain of the Des Plaines system.

2.6.3 Geology and Soils

Much of Cook County has not been mapped in detail by the U.S. Department of Agriculture (1979) because of urban land use. However, the report supplies a regional soil map that classifies the near-surface soil near AGI as nearly level, poorly drained soil resulting from the deposition of clay and silt in a glacial lake.

Geology at the site is an unknown thickness of glacial deposits (lacustrine clay, till, and outwash) over Paleozoic sedimentary rock units. No site-specific information on the stratigraphy is presently available. However, a detailed statewide study by Berg and Kempton (1988) provides three-dimensional regional mapping of geologic materials to a depth of 50 feet. Their map suggests that at least 50 feet of clayey and silty tills and lacustrine deposits is normal for the area.

2.6.4

Ground Water

Very little site-specific hydrogeologic information is currently available. Therefore, no statements may be made regarding the ground-water flow rates or flow directions, the stratigraphic position of aquifers beneath the site, or the possible interaction of ground water and surface water at the adjacent river. Borings made during the abandonment of the underground storage tanks indicate the depth to the water table is approximately eleven feet. Regional ground-water data is presented below.

In the northeastern Illinois region, ground water is obtained from four major aquifer systems--the glacial drift system, the shallow bedrock system, and two deep bedrock systems. They are distinguished by their hydrogeologic properties and recharge source areas (Hughes et al, 1966). In central Cook County, the glacial drift is thin, and sand and gravel deposits are either thin or absent. Virtually all wells penetrate deep bedrock aquifers (Bergstrom et al., 1955).

The shallow bedrock aquifer system in northeastern Illinois underlies the glacial drift system and is composed mainly of Silurian dolomite formations. The upper boundary of this system is the bedrock-drift contact; the lower boundary is the upper Ordovician Maquoketa Shale. Water from this aquifer is obtained from fractures and solution openings in the Silurian dolomite beds (Hughes, et al., 1966). The shallow bedrock aquifer system receives some recharge locally from precipitation (Hughes et al., 1966).

The deep bedrock-aquifer systems include the Cambrian-Ordovician and Mt. Simon aquifer systems. The Cambrian-Ordovician aquifer system contains two major aquifers--the Glenwood-St. Peter and the Ironton-Galesville. The top of the Cambrian-Ordovician aquifer system is the Galena-Platteville Dolomite. The Glenwood-St. Peter aquifer is widely utilized where water requirements are less than 200-gallons per minute (gpm). This unit has a hydraulic conductivity between nine and 15-gallons per day per square foot (gpd/sq. ft.). The Ironton-Galesville Sandstone aquifer has a hydraulic conductivity between 30 and 40 gpd/sq. ft. Recharge to the deep bedrock aquifer systems is mostly from west and north of the six-county metropolitan area, where rocks crop out at the surface or lie immediately below the glacial drift. Minor recharge occurs as leakage through the shallow bedrock aquifer system (Hughes et al., 1966).

The Mt. Simon aquifer system is bounded above by the relatively impermeable shales and siltstones of the upper and middle Eau Claire Formation and below by pre-Cambrian basement

rock. The average hydraulic conductivity of the aquifer system is 16 gpd/sq. ft. (Hughes et al., 1966) and recharge is largely from the outcrop region of Cambrian rocks in central southern Wisconsin (Willman, 1971).

The facility is located in Melrose Park, Cook County, Illinois, which receives its drinking water from Lake Michigan. The nearest communities that use ground water for daily drinking water are located about 20 miles west of the facility in western DuPage County, along and west of State Route 59. Until 1992, all of DuPage County drinking water was obtained from ground-water sources, but since 1992, it is obtained from Lake Michigan. However, ground-water wells throughout the county are maintained as an emergency backup supply. The eastern boundary of DuPage County is located about 4 miles west of the facility (PRC, 1993).

2.7 RECEPTORS

The AGI facility occupies approximately six acres in an industrial area in Melrose Park, Illinois. Melrose Park has a population of approximately 25,000.

The AGI facility is bordered on the north by the Temperature and Equipment Corp. Behind the building is a railroad spur, approximately 25 to 30 feet west. Beyond the railroad is Golden Dipt, which fronts on Hawthorne Avenue. On the south is North Avenue, on the southeast is Indian Boundary Road, and on the east is Lindberg Heat Treating across Ruby Street. The nearest school, Stevenson School, is located approximately 3,400 feet southeast of the facility.

There is no formal security system. Facility access is controlled by keeping all doors locked and screening all visitors at the front entrance. Except for a 25-square-foot enclosure for raw materials on the west side, the facility is not fenced.

The Drum Storage Pad is not fenced and is located between the building and the railroad. The railroad is about 30 feet from the building; this does not allow space to keep ignitable materials a minimum of 50 feet from the facility property line.

The nearest surface water body, Silver Creek, is located a half mile east of the facility and is used for industrial purposes. Other surface-water bodies in the area include the Des Plaines River, about two miles east of the facility.

Ground water is not used as a drinking water supply in Melrose Park. Melrose Park obtains its drinking water supply from Lake Michigan, located 13 miles east of the facility. The nearest communities that use ground water for a daily drinking water source are located about 20 miles west of the facility in western DuPage County, along and west of State Route 59. However, ground-water wells throughout DuPage County are maintained as an emergency backup supply. The eastern boundary of DuPage County is located about 4 miles west of the facility.

Sensitive environments are not located on site. There are no wetlands, sensitive habitats, or national/state parks within two miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the nine SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and BVWST observations. Figure 2 shows the SWMUs locations.

SWMU 1

Waste Paper Collection Area

Unit Description: The Waste Paper Collection Area is at the western end of the facility. This unit is used to collect waste paper cut from printed sheets. The waste paper is swept into a cyclone that deposits it into a bin. This unit is made of metal and measures approximately 100 square feet. The walls and floor of this unit are concrete. No specific boundary area exists to contain the waste paper (see Photograph No.11).

Date of Startup: According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.

Date of Closure: The unit is active.

Wastes Managed: This unit manages paper waste. Wastes from this unit are ultimately recycled by Atlas Recycling in Chicago, Illinois.

Release Controls: This unit is located indoors on a concrete floor. A sprinkler system and large fire extinguisher are located in this area.

History of Documented Releases: No releases have been documented from this unit.

Observations: This unit was full of waste paper during the VSI. This unit had no apparent boundary; however, it appeared to adequately contain

waste paper. This unit is not used to manage hazardous materials. No evidence of a release was observed.

SWMU 2

Paper Waste Storage Room

Unit Description:

The Paper Waste Storage Room is located above ground at the southeastern end of the facility. This unit is used to store the bales of waste paper generated by the baling machine. These bales are separated by grade of paper and prepared for removal. This unit measures 500 square feet and consists of concrete floor and walls (see Photograph No. 13).

Date of Startup:

According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages paper waste. Wastes from this unit are ultimately recycled by Atlas Recycling in Chicago, Illinois.

Release Controls:

This unit is located indoors on a concrete floor and has a sprinkler system for possible fires.

History of Documented Releases:

No releases from this unit have been documented.

Observations:

This unit contained about 25 bales of various grades of waste paper during the VSI. This unit is not used to manage hazardous materials. No evidence of a release was observed.

SWMU 3

Waste Ink Satellite Accumulation Area

Unit Description:

The Waste Ink SAA is located in the southern end of the manufacturing area. This unit is used to store the 55-gallon waste

ink drum, which receives all excess ink from all the printing presses, before it is moved to the Drum Storage Pad (SWMU 8). The drum is constructed of steel and is located in an area constructed with concrete floor and walls. (see Photograph No. 14).

Date of Startup: According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.

Date of Closure: The unit is active.

Wastes Managed: This unit manages waste ink (D001). Currently, wastes from this unit are ultimately picked up by Safety-Kleen Corp. However, facility representatives indicated that they do not know how the waste was managed prior to 1980.

Release Controls: The unit is indoors on a concrete floor.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit contained about 25 gallons of waste ink. In Photograph No. 14, the drum lid is in place but is not secured. Full, open cans of waste ink are setting on the floor by the drum. No evidence of a release was observed.

SWMU 4 Printing Press Satellite Accumulation Area

Unit Description: The Printing Press SAA is in the northern end of the facility. This unit is an SAA for waste products that are regularly generated by the printing presses. SWMU 4 is a collective name for substations located by each of the six printing presses. At each substation are a drum for water/alcohol "fountain" solution, a drum for waste lubricating oil and a pallet for quality assurance pullout sheets. Additionally, a drum for waste press "washup" solution is kept by

Press No. 12. The drums rest on a concrete floor (Photographs Nos. 1, 2, 3, and 4).

Date of Startup: According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.

Date of Closure: This unit is active.

Wastes Managed: This unit manages waste water/alcohol mixture (D001), waste lubrication oil (D001) in drums and quality assurance pullout sheets.. Additionally, a drum for waste press "washup" solution is kept by Press No. 12. Approximately 25-45% is taken to the solvent recovery still, where it is distilled and recovered for use on the printing press. Currently, the remaining 55-75% of wastes from this unit are transferred to the drum storage pad (SWMU 8), where they are picked up by Safety-Kleen Corp. Facility representatives indicated that they do not know how the wastes were managed prior to 1980.

Release Controls: The unit is located indoors on a concrete floor.

History of Documented Releases: No releases from this unit have been documented.

Observations: This unit contained waste water/alcohol and waste lubricating oil during the VSI. This unit consisted of a 55-gallon drum of waste water/alcohol, a 55-gallon drum of lubricating oil, and a pallet of sheets of paper removed from the press for quality control by each press. Additionally, a drum for waste press "washup" solution is kept by Press No. 12. The drums are kept closed except when receiving waste. There were no visible signs of release.

SWMU 5**Press "Washups" Satellite Accumulation Area****Unit Description:**

The Press "Washups" SAA is at the northwestern corner of the building, on a concrete floor. This unit stores "press washups" in 55-gallon drums from the weekly press cleaning. This unit measures 50 square feet and is made with a concrete floor and cement block walls. The drums are made of a metal alloy (see Photograph No. 7).

Date of Startup:

According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages press "washups" (D001) in 55-gallon drums. Currently, full drums of wastes from this unit are ultimately moved to the drum storage pad (SWMU 8) where they are picked up by Safety-Kleen Corp. Facility representatives indicated that they do not know how the wastes were managed prior to 1980.

Release Controls:

This unit is located on a concrete floor with no floor drains in the area. The area is diked to prevent spill releases.

**History of
Documented Releases:**

No releases from this unit have been documented.

Observations:

A drum, shown in Photo No. 7, is open, with a funnel in the opening.

This unit contained one 55-gallon drum approximately one-half full of press "washup", and several full drums during the VSI. When a drum becomes full, it must be moved from satellite accumulation to the drum storage pad (SWMU 8) within three days. The large number of drums in SWMU 5 (five are visible in Photograph No. 7)

makes it questionable that full drums are being removed from the unit properly. No evidence of a release was observed.

SWMU 6

Waste Coatings Satellite Accumulation Area

Unit Description: The Waste Coatings SAA is in the southern corner of the raw materials storage room in the northwestern corner of the plant. This unit is used as the primary collection area for contaminated or excess waste coatings. This unit measures 25 square feet and consists of a concrete floor and cement block and brick walls. The lower portion of the walls are shielded with steel sheeting. The drums are of metal alloy (Photographs Nos. 5 and 6).

Date of Startup: This unit began operation on November 14, 1991. Prior to this time, there was no central collection of waste coatings.

Date of Closure: This unit is active.

Wastes Managed: This unit manages waste water-based and ultra-violet coatings (D001) in 55-gallon drums. Currently, wastes from this unit are moved to the drum storage pad (SWMU 8), where they are picked up by Safety Kleen. Facility representatives indicated that they do not know how the waste was managed prior to 1981.

Release Controls: The drums are indoors on a concrete floor. No floor drains existed in the area.

History of Documented Releases: No releases from this unit have been documented.

Observations: This unit contained one drum of waste water base coating and one drum of waste ultraviolet coating. The area was clean and well marked. No cracks were visible in the floor. No evidence of release was noted.

SWMU 7**Waste Glue Satellite Accumulation Area****Unit Description:**

The Waste Glue SAA is located in the southwestern corner of the facility. It is indoors on a concrete floor. This unit is used to collect waste glue (D001). The drum being used for waste glue collection in Photograph No. 12 is constructed of paperboard with metal closures on each end; however, waste glue is usually collected in steel drums (AGI, 1992).

Date of Startup:

According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages waste glue (D001) in a 55-gallon drum. Currently, wastes in drums are transferred to the drum storage pad (SWMU 8) where they are ultimately picked up by Safety-Kleen Corp. Facility representatives indicated that they do not know how the waste was managed prior to 1980.

Release Controls:

The unit rests on a pallet on the concrete floor, indoors.

**History of
Documented Releases:**

No releases from this unit have been documented.

Observations:

This drum was about 50% full of the flammable adhesive during the VSI. The floor had no visible signs of cracks. No evidence of a release was observed.

SWMU 8**Drum Storage Pad****Unit Description:**

The Drum Storage Pad is located outdoors on the northwestern corner of the property. This unit stores all of the wastes to be picked up by Safety-Kleen Corp. Personnel at AGI state wastes are

stored for less than 90 days, however, generation rates and quantities on site, recorded during an IEPA inspection (IEPA, 1991) indicate storage time exceeds 90 days. This unit is on asphalt pavement approximately 125 feet by 12 feet, capable of storing about 300 drums. (see Photographs Nos. 8, 9, and 10).

Date of Startup:	According to facility representatives, this unit has been in use since at least 1980. Facility representatives indicated that they could not verify that this SWMU existed prior to 1980.
Date of Closure:	The unit is active.
Wastes Managed:	This unit manages all wastes generated at the facility except paper. Currently, wastes from this unit are ultimately picked up by Safety-Kleen Corp. Facility representatives indicated that they do not know how the waste was managed prior to 1980.
Release Controls:	<p>This unit is located on an asphalt pad.</p> <p>AGI had plans to dike, roof and fence this area, but no part of the drum storage pad is more than 50 feet from the property boundary. AGI consultants, Environmental Risk Consultants Inc., of Evanston, Illinois, are preparing a request for a variance to be allowed to store drums in this area before proceeding with other modifications.</p>
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit contained approximately 100 full, 55-gallon drums for pick-up. All of the drums were sealed and labeled. No evidence of a release was observed.

SWMU 9**Still Bottoms Satellite Accumulation Area****Unit Description:**

This unit is located adjacent to the solvent recovery still in the northwest corner of the facility. It consists of a steel drum for collection of still bottoms left from the recycling process.

Date of Startup:

This unit has been in use since the initiation of the solvent recovery process in 1991.

Date of Closure:

This unit is active.

Waste Managed:

This unit is used to manage the still bottoms left over from the distillation of the used water/alcohol solution from the presses. Wastes in drums are moved to the drum storage pad (SWMU 8) where they are ultimately picked up by Safety-Kleen Corp.

Release Controls:

This area is located indoors, on a concrete floor, and is diked to prevent spill releases.

**History of
Documented Releases:**

No releases for this unit have been documented.

Observations:

This unit was identified during phone conversations between BVWST and the AGI Technical Analyst after the VSI. Consequently, no observations of the unit were made during the VSI.

4.0 AREAS OF CONCERN

BVWST observed no AOCs during the VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified nine SWMUs and no AOCs at the AGI facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. Following are BVWST's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the AGI facility and recommended further actions.

SWMU 1 Waste Paper Collection Area

Conclusions: A low potential for release to air, soil, ground water, or surface water exists. This unit is located indoors on a concrete floor and contains non-hazardous waste. The area is well contained and has fire precautions.

Recommendations: No further action is recommended.

SWMU 2 Paper Waste Storage Room

Conclusions: A low potential for release to air, soil, ground water, or surface water exists. This unit is located indoors on a concrete floor and contains non-hazardous waste. The area is well contained and has fire precautions.

Recommendations: No further action is recommended.

SWMU 3 Waste Ink Satellite Accumulation Area

Conclusions: A low potential for release to air, soil, ground water, and surface water exists. This unit is indoors and the drums are covered and rest on a concrete floor. This unit handles only small quantities of waste so that releases would be easily controlled or prevented. However, photograph No. 14 shows open cans of ink on the floor next to the accumulation drum.

Recommendations: BVWST recommends containers of waste be maintained closed.

SWMU 4 Printing Press Satellite Accumulation Areas

Conclusions: A low potential for release to air, soil, ground water, and surface water exists at this unit. This unit is indoors on a concrete floor and the drums are covered. This unit handles only small quantities of waste so that releases would be easily controlled or prevented.

Recommendations: No further action is recommended.

SWMU 5 Press "Washups" Satellite Accumulation Area

Conclusions: A low potential for release to air, soil, ground water, and surface water exists at this unit. The concrete floor in this area is lower than the rest of the building to ensure that a release would be easily contained. The door to this room is very well secured. However, Photograph No. 7 shows five drums, one of which is open, with used rags lying around. The large number of drums in the unit makes it questionable that full drums are being removed from the unit properly.

Recommendations: BVWST suggests that drums must be closed except when it is necessary to add or remove waste, and that full drums be removed from the unit within three days.

SWMU 6 Waste Coatings Satellite Accumulation Area

Conclusions: A low potential for release to air, soil, ground water, and surface water exists at this unit. The drums are kept on a concrete floor and are kept covered. This unit handles only small quantities of waste coating so that releases would be easily controlled or prevented.

Recommendations: No further action is recommended.

SWMU 7 Waste Glue Satellite Accumulation Area

Conclusions: A low potential for release to air, soil, ground water, and surface water exists. This unit is on a pallet on a concrete floor and a relatively small amount of waste glue is handled.

Recommendations: No further action is recommended.

SWMU 8 Drum Storage Pad

Conclusions: A moderate potential for release to the soil and ground water exists. The drum storage pad is upgradient of the slope that leads to the railroad tracks behind the facility. AGI recently covered and overpacked 26 drums containing an unknown substance. The condition of the drums and length of time they were uncovered are unknown. Because these drums remained outdoors on an uncurbed asphalt pad for an unknown period of time, the possibility of a release to air and surface soil exists.

Recommendations: Soil sampling on the sloping area of the drum storage pad.

Because of the physical constraints of this location, this unit cannot be brought into compliance with 40 CFR Part 265 Subpart I. AGI consultants are preparing a request for a variance to be allowed to store drums in this area.

BVWST recommends that drums be stored in accordance with 40 CFR Part 265 Subpart I, or with an approved variance.

The apparent contradictions between generation rates, quantities on site, and storage periods should be resolved.

SWMU 9

Still Bottoms Satellite Accumulation Area

Conclusions:

A low potential for release to air, soil, ground water, and surface water exists. This unit is on a diked concrete floor and a relatively small amount of still bottom material is handled.

Recommendations:

No further action is recommended.

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TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Waste Paper Satellite Collection Area	1980 to present	one	No further action recommended.
2. Paper Waste Storage Room	1980 to present	None	No further action recommended.
3. Waste Ink Satellite Accumulation Area	1980 to present	None	Drums should be stored closed.
4. Printing Press Satellite Accumulation Areas	1980 to present	None	No further action recommended.
5. Press "Washups" Satellite Accumulation Area	May 1980 to present	None	Drums should be stored closed.
6. Waste Coatings Satellite Accumulation Area	May 1981 to present	None	No further action recommended.
7. Waste Glue Satellite Accumulation Area	1980 to present	None	No further action recommended.
8. Drum Storage Pad	1980 to present	None	Soil Sampling. Drums should be stored in accordance with 40 CFR Part 265, Subpart I, or an approved variance. Storage times should be verified.
9. Still Bottom Satellite Accumulation Area	1991 to present	None	No further action recommended.

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- Metropolitan Water Reclamation District of Greater Chicago (MWRDGC), 1992a. Kelly, Frank, Industrial Waste Department, in personal communication to BVWST, Margie Casserly, Environmental Engineer, telephone memorandum, March 20.
- MWRDGC, 1992b. Stube, William, Industrial Waste Engineer, Enforcement Section, in personal communication to BVWST, Margie Casserly, Environmental Engineer, telephone memorandum, April 8.
- PRC Environmental Management, Inc., 1993. Brancel, Celeste, Log of Telephone Conversation with Leonard Lindstrom, IEPA, February 5.

U.S. Department of Agriculture, 1979. Soil Survey of DuPage and Part of Cook Counties, Illinois, May.

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ATTACHMENT A
PRELIMINARY ASSESSMENT
FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE
IL

02 SITE NUMBER
ILD 047580006

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
AGI, Inc.

02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER
1950 North Ruby Street

03 CITY
Melrose Park

04 STATE
IL

05 ZIP CODE
60160

06 COUNTY
Cook

07 COUNTY
CODE

08 CONG
DIST

09 COORDINATES: LATITUDE
41° 54' 30" N

LONGITUDE
187° 52' 30" W

10 DIRECTIONS TO SITE (Starting from nearest public road)

From Chicago, take 290 West to 1st Avenue. Take 1st Ave. North to North Avenue, At this intersection, make a left (West on North Ave.). Continue on North Avenue for approximately 1 mile to Ruby St. Make a right.

III. RESPONSIBLE PARTIES

01 OWNER (If known)
Ruby North Partnership

02 STREET (Business, mailing residential)
1950 North Ruby Street

03 CITY
Melrose Park

04 STATE
IL

05 ZIP CODE
60160

06 TELEPHONE NUMBER
(708) 344-9100

07 OPERATOR (If known and different from owner)
AGI, Inc.

08 STREET (Business, mailing, residential)
1950 North Ruby Street

09 CITY
Melrose Park

10 STATE
IL

11 ZIP CODE
60160

12 TELEPHONE NUMBER
(708) 344-9100

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE

☐ B. FEDERAL:

(Agency Name)

☐ C. STATE

☐ D. COUNTY

☐ E. MUNICIPAL

☐ F. OTHER:

(Specify)

☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3010 DATE RECEIVED: 08/8/80
MONTH DAY YEAR

☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / /
MONTH DAY YEAR

☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

BY (Check all that apply)

☐ A. EPA

☒ B. EPA CONTRACTOR

☐ C. STATE

☐ D. OTHER CONTRACTOR

☒ YES

DATE 12/10/91

☐ E. LOCAL HEALTH OFFICIAL

☐ F. OTHER:

(Specify)

☐ NO

CONTRACTOR NAME(S): BVVST

02 SITE STATUS (Check one)

☒ A. ACTIVE

☐ B. INACTIVE

☐ C. UNKNOWN

03 YEARS OF OPERATION

1971 IN/A
BEGINNING YEAR ENDING YEAR

☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Hazardous and ignitable wastes from package production.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Drums of ignitable waste are stored less than 50 feet from the property line.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

☐ A. HIGH

(Inspection required promptly)

☐ B. MEDIUM

(Inspection required)

☐ C. LOW

(Inspect on time-available basis)

☐ D. NONE

(No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT
Kevin Pierard

02 OF (Agency/Organization)
U.S. EPA

03 TELEPHONE NUMBER
(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT
Ramona Reints

05 AGENCY

06 ORGANIZATION
BVVST

07 TELEPHONE NUMBER
(312) 346-3775

08 DATE
5/15/92
MONTH DAY YEAR

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

AGI, Inc.
1950 N. Ruby Street
Melrose Park, IL 60160
ILD 047 580 006

Date: December 10, 1991

Facility Representatives: Dennis McGuinn, Director of Human Resources
Tony Emerson, Technical Analyst (708) 344-9100
Stan Wheeler, V.P. of Operations

Inspection Team: Michael Eng, BVWST
Anil Saxena, BVWST

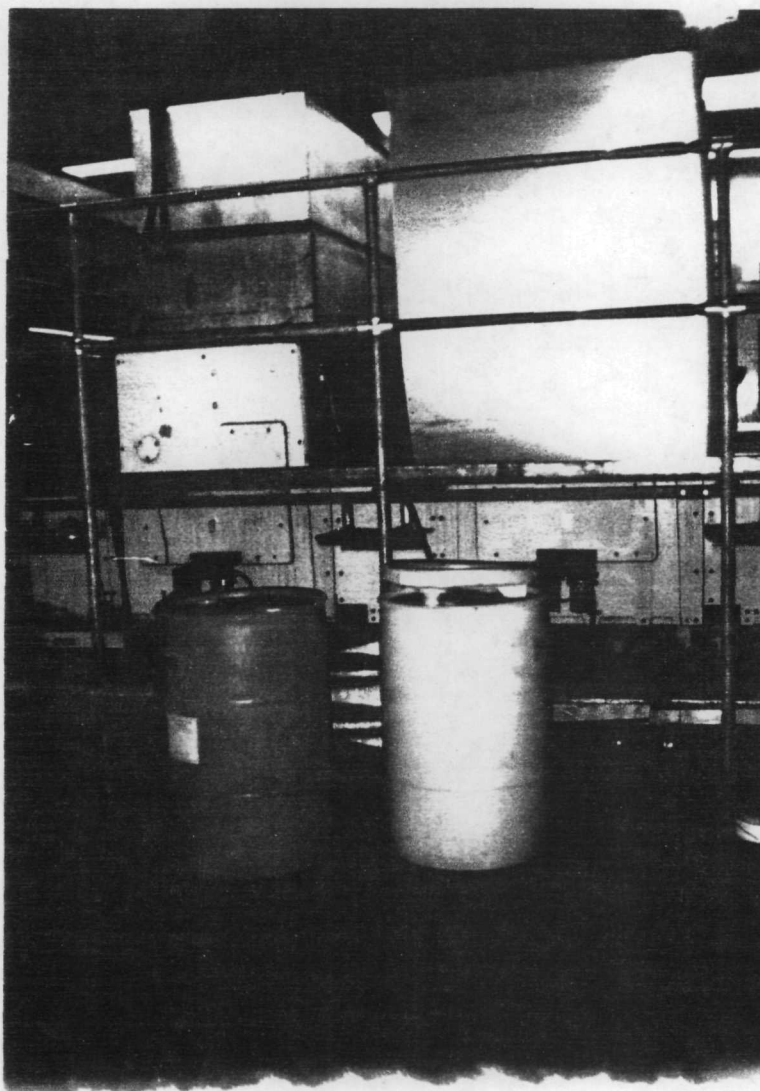
Photographer: Anil Saxena, BVWST

Weather Conditions: Sunny and windy, temperature around 45°F.

Summary of Activities: The visual site inspection (VSI) began with a meeting at 10:00 a.m. The inspection team discussed the purpose of the VSI. Mr. Wheeler described the mechanical aspects of printing and AGI's history. Past and present waste management techniques were reviewed, especially those concerning a recent emphasis on paper waste reduction. This included using recycled paper, recycling waste paper, and distilling waste water. Past and current operations and release history were also discussed. Most of the information was exchanged on a question-and-answer basis. Mr. McGuinn provided the inspection team with copies of documents requested by the inspection team.

At 11:00 a.m. Mr. McGuinn and Mr. Emerson gave the inspection team a tour of the facility including the production and solid waste management areas. He also explained the waste generating processes. Photographs were taken of all active SWMUs and related areas.

The tour concluded at 1:15 p.m. The inspection team held an exit meeting with Mr. McGuinn, Mr. Emerson, and Mr. Wheeler. The VSI was completed at 1:45 p.m.



Photograph No. 1

Orientation: North

Description: Satellite accumulation substation for water/alcohol solution at Press 9.
Drums flush with press.

Location: SWMU 4

Date: 12/10/91



Photograph No. 2

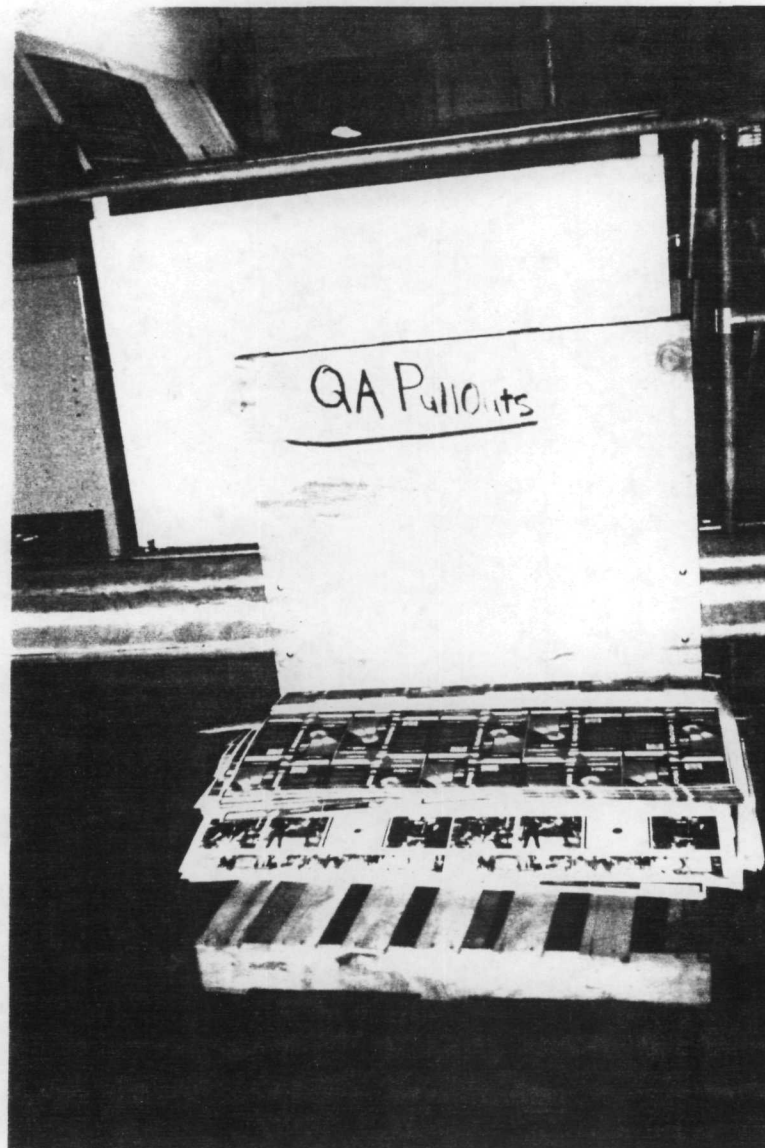
Orientation: South

Description: In press room facing south.

Satellite accumulation substation for water/alcohol solution and oil accumulation waste at Press 11.

Location: SWMU 4

Date: 12/10/91



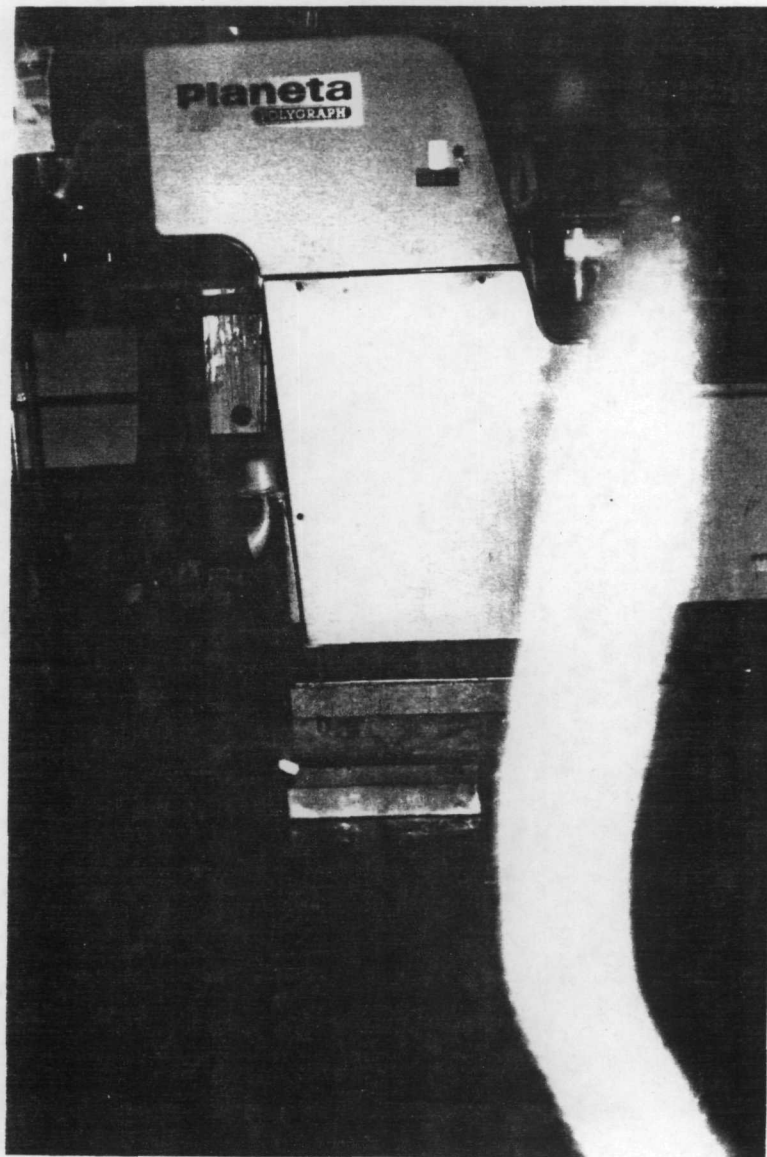
Photograph No. 3

Orientation: North

Description: Satellite accumulation substation at Press 9 with waste paper being staged to be brought to the bailing.

Location: SWMU 4

Date: 12/10/91



Photograph No. 4

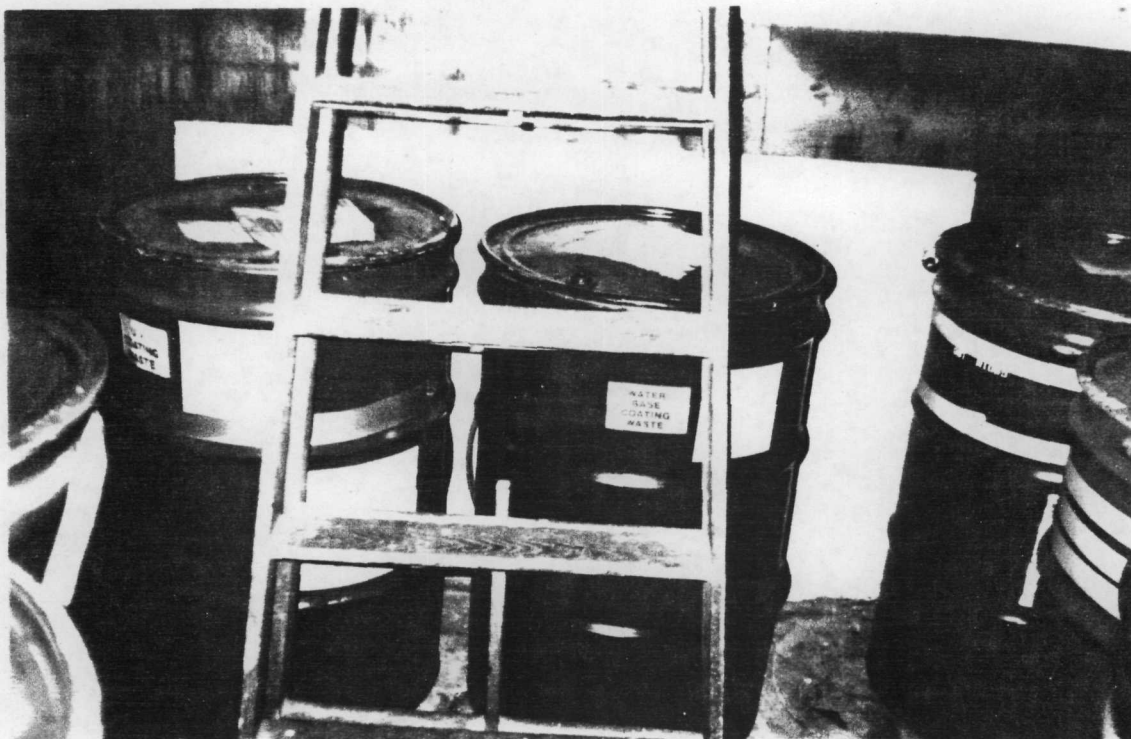
Orientation: South

Description: Lubricating oil being collected in pan (foreground) at base of press.

This will be transferred to a drum in the satellite accumulation substation associated with this press, and full drums are moved to SWMU 8.

Location: SWMU 4

Date: 12/10/91



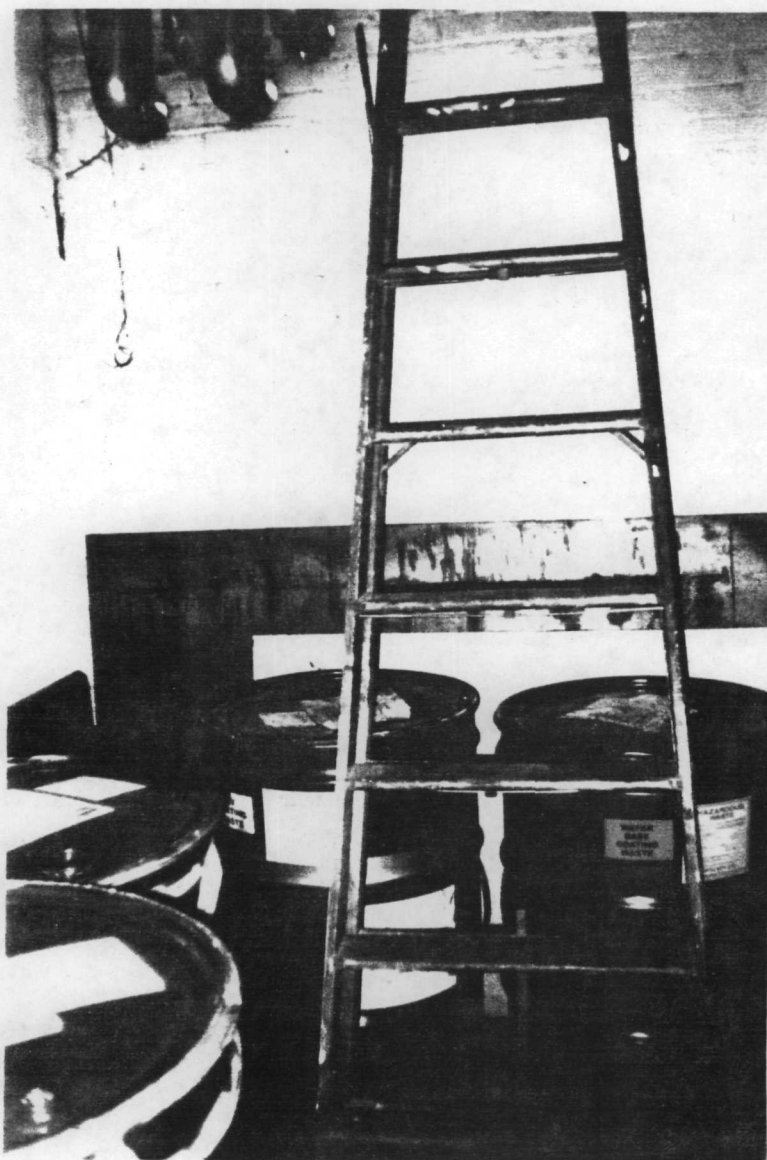
Photograph No. 5

Orientation: West

Description: In raw materials storage building, facing drums of UV and water base coating waste.

Location: SWMU 6

Date: 12/10/91



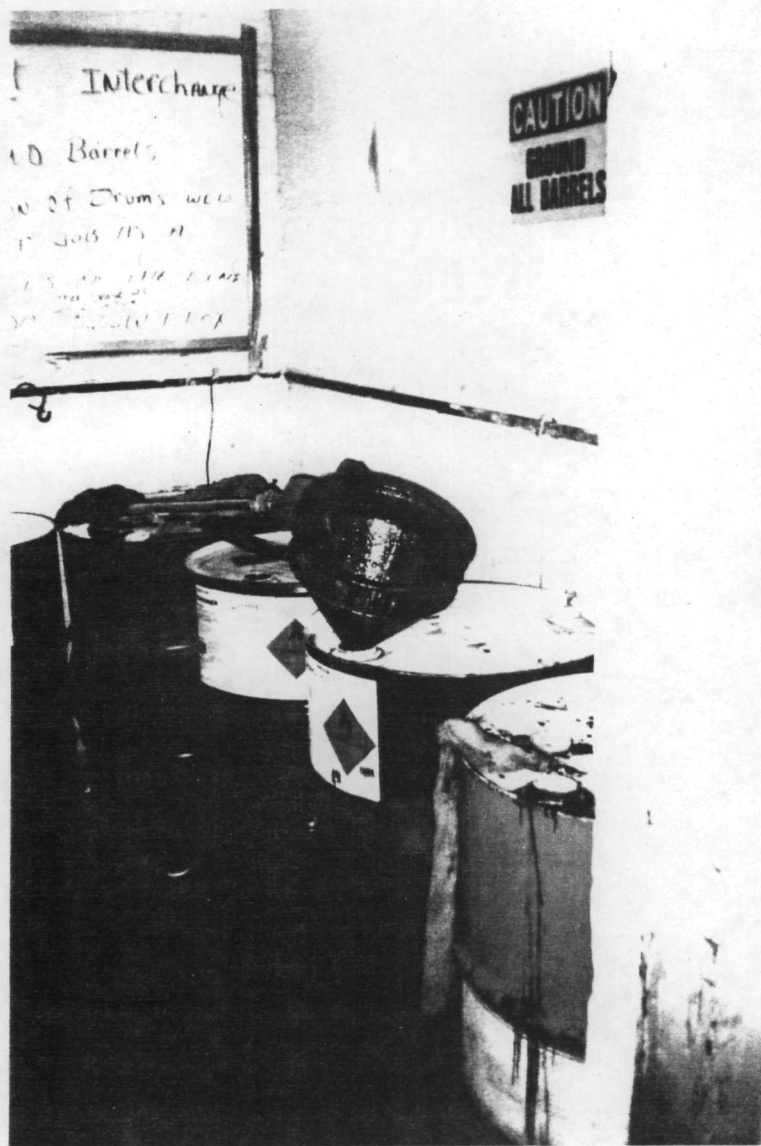
Photograph No. 6

Orientation: West

Description: A different angle of UV and water-based coating waste.

Location: SWMU 6

Date: 12/10/91



Photograph No. 7

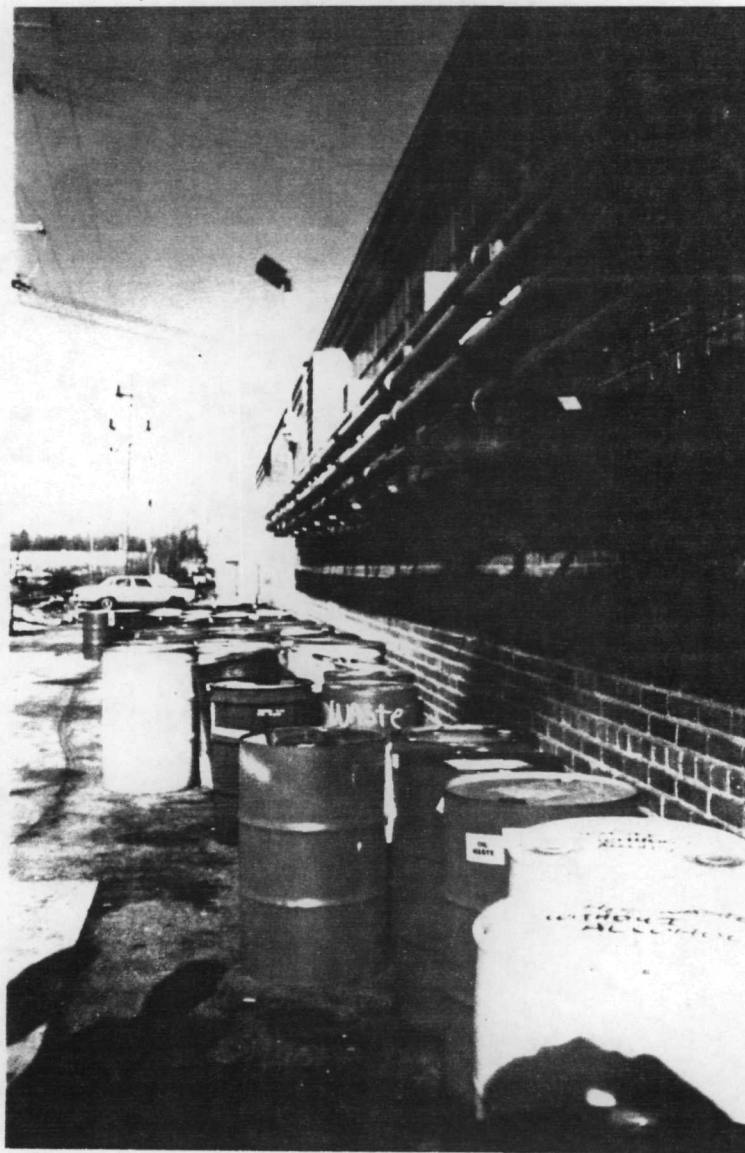
Orientation: West

Description: Drum with funnel, half-full, used as area's press 'washup' satellite collection.

Other drums are full and waiting to be taken to the Drum Storage Pad (SWMU 8).

Location: SWMU 5

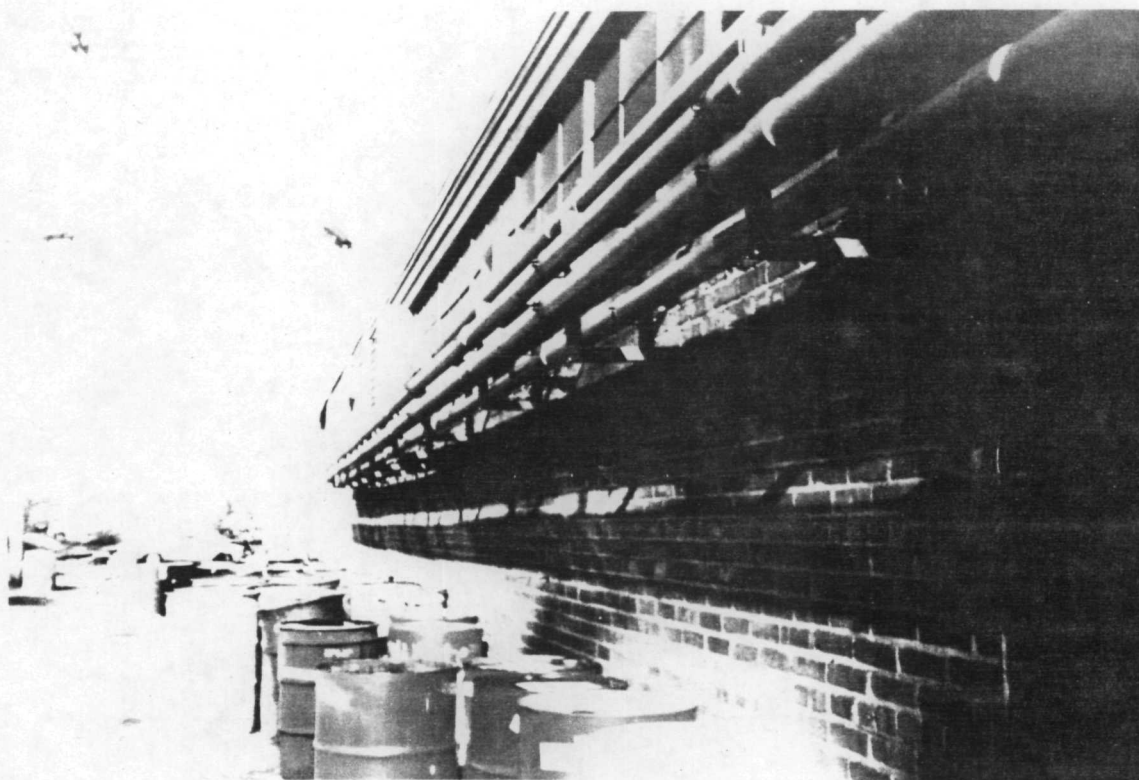
Date: 12/10/91



Photograph No. 8
Orientation: North

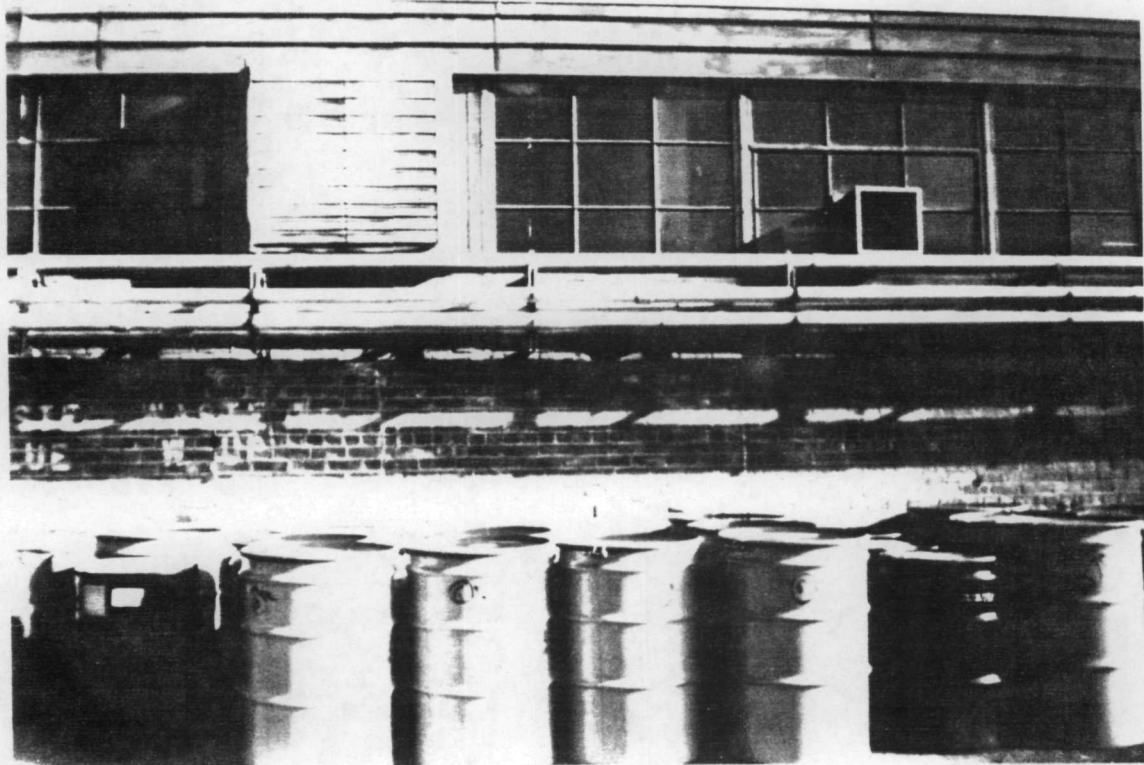
Location: SWMU 8
Date: 12/10/91

Description: Final staging area for all wastes, except paper, to be picked up by Safety-Kleen.



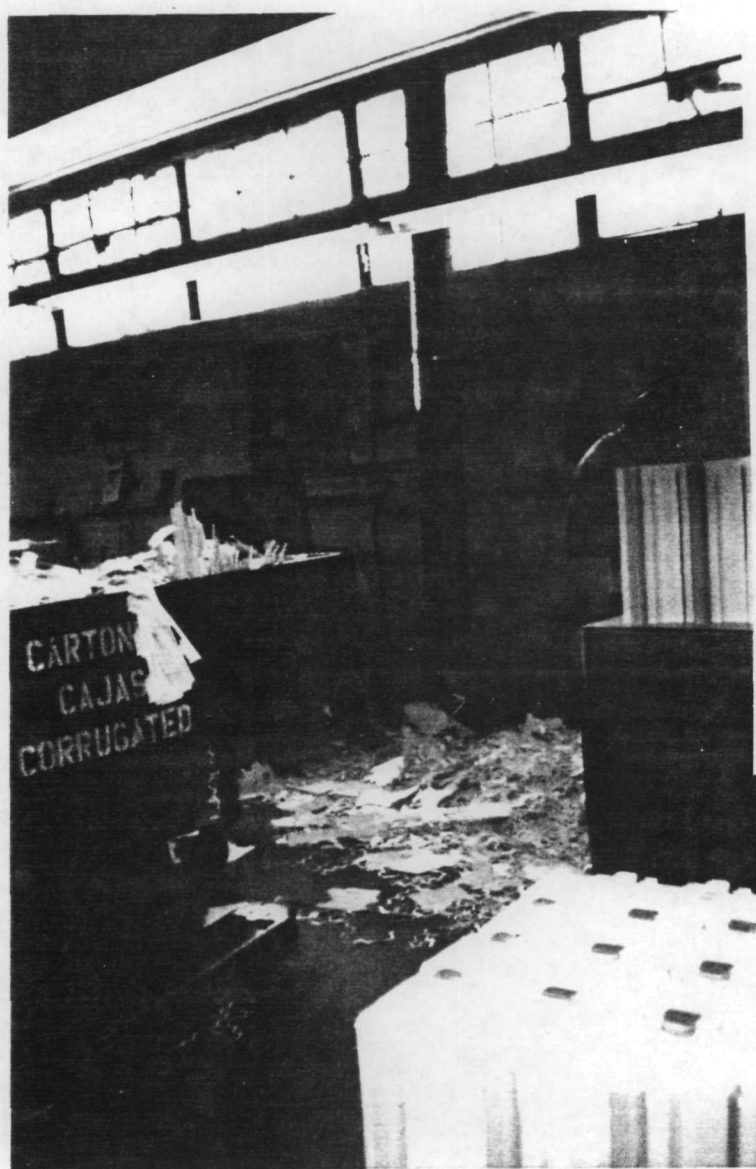
Photograph No. 9
 Orientation: North
 Description: Facing the final staging area.

Location: SWMU 8
 Date: 12/10/91



Photograph No. 10
 Orientation: East
 Description: On the Drum Storage Pad (SWMU 8) facing overpack drums of unknown wastes.

Location: SWMU 8
 Date: 12/10/91



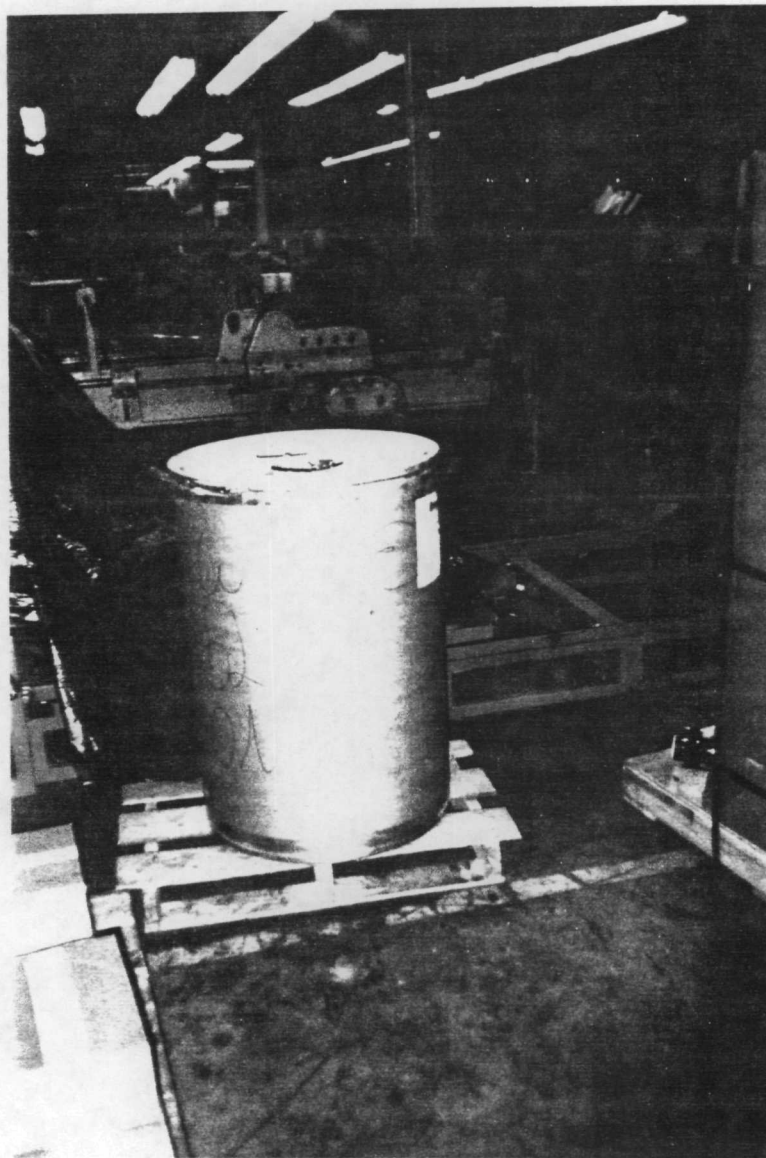
Photograph No. 11

Orientation: West

Description: In paper stripping room where cartons are cut out of sheets. Paper waste is collected either in the cyclone or on carts to be moved to bailing room.

Location: SWMU 1

Date: 12/10/91



Photograph No. 12

Orientation: North

Description: In finishing room facing drum for collection of waste glue.

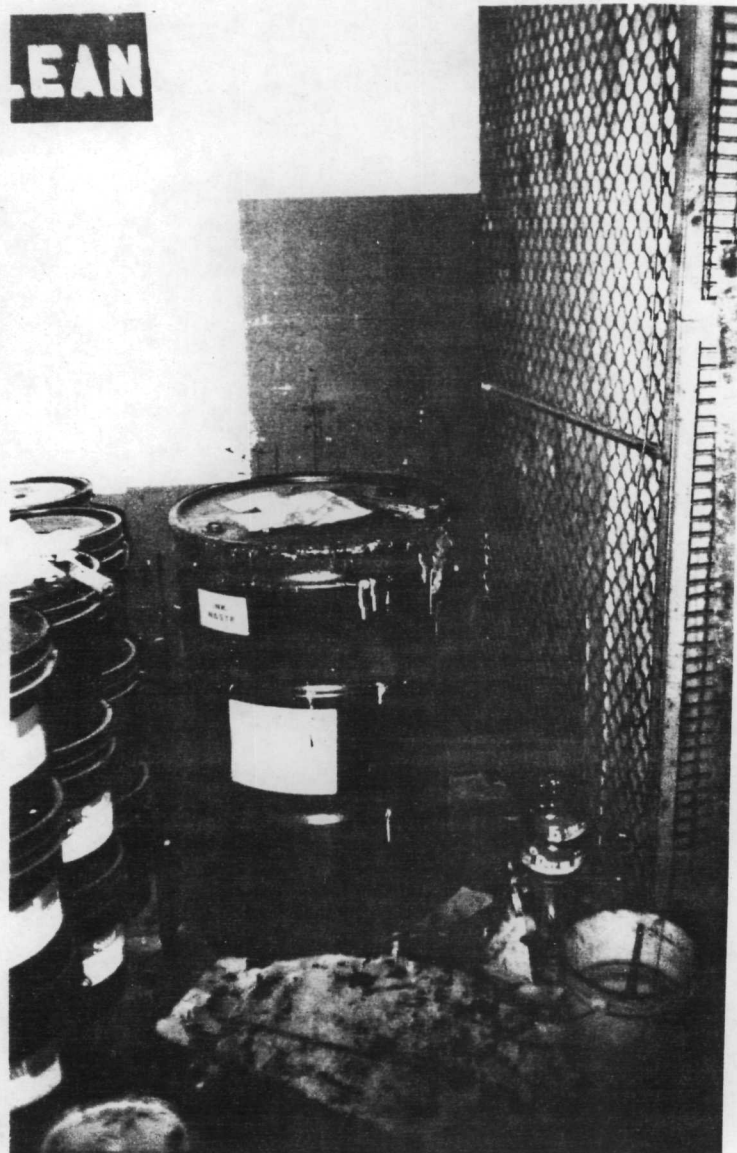
Location: SWMU 7

Date: 12/10/91



Photograph No. 13
Orientation: Southwest
Description: Baled paper in its final staging waiting for resale.

Location: SWMU 2
Date: 12/10/91



Photograph No. 14

Orientation: West

Description: In press room at waste ink satellite accumulation area.

Location: SWMU 3

Date: 12/10/91

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

Upon processing of film, it was found that the first picture was a blank. The copied field notes were subsequently changed to reflect the change in numbering. Therefore, picture number 2 in the field notes is now picture 1, 3 is 2, 4 is 3, etc.

①

12/10/91

10:00 am

AG-1

1950

Dennis McGinn
Director of Human Resources

Tony Emerson
Record Keeping

Stan Wheeler
V.P. of Operations

Projects (continued)

(2)

produces packaging —
reel and
cosmetics
Folding carton.

5 presses (printings) —
sheet-fed
1 press — roll fed.

Diecutters —

6 guers — fold + seal.

paper board.
printing inks
water & alcohol — cleaning
press washups.
coatings — high gloss
glue.
lubricating oil.

paper waste.

(2)

260,000 sq ft.

360 people

2 shifts.

1991 - thru November

~ 7000 hrs paper board

1971 — began

1958 — Pawngcart^{ers} ~~trans~~ Calendar Co.

rented to AG-1 until they took over the property

(A)

Paper — sheeted to app size
printing process.
dye cutout
glue machine

Cyclone ~~box~~ deposits
into trailer
in bin

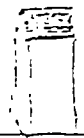
Hogger — shreds sheets
of paper into

separate piles of paper
by value

sold to one dealer.

~~##~~ Atlas Recycling
Chicago, IL
W. Barry St.

8.5 million pounds in 1990



(5)

UV reactive inks
95% —

no solvent

from General Printing Inks (GPI)

waste because of extra,
unnecessary product.

to back dock
accumulation areas into
55 gallon drum

① for ink only.

*
moved to staging area.

Safety Klean

Elgin, IL

5% conventional oil-based inks
handled the same.

(6)

water/alcohol

Continuous cleaning of
printing presses during
printing procedure.

periodically expired when
too soiled. ~ 1 week

Waste Fountain Solution

satellite collection at each
press. — ~~etc~~

Brought to solvent recovery still.

Distilled to fresh. $H_2O/EtOH$.

still bottoms collected at
room. until full
moved to King Street

Safety-Kleen takes still bottoms
ethylene glycol + ink. —
major component.

(7)

not all $H_2O/EtOH$ goes
to still yet - some
 $H_2O/EtOH$ goes to kuf
GWMU in 55 gals.

Press washups

w/ color change or at end
of week

Solvent based
on rollers

Int: solvent
collected in
Storage Room.

Solvent based

compounds!

collected in
washup pan

mixture

Chemical

55 gal
drum.

in
55 gal
drum

(12)

eventually moved out back
to King Building

→ Safety Klean

Coatings - raw materials
pumped w/ diaphragm pump
& deposits on blanket up to
X-fers into paper.

Only waste is extra 1 often
w/ additive in it.

Collection station is near
raw material storage.

Oil drains go to ESW MW

& Safety Klean vehicles

(19)

Glue — 30 or 55 gal drums.
+ totes. (~300 gals)

either pumped to glue pot

injected into nozzle & applied
to carton.
Folds carton
+ stacks the cartons.

30 + 55s. pop into pot.

Glue pots are cleaned or
form skin on top which is
removed

stored - satellite collection
at finishing room.

All drums moved to the
wing

safety clean. collects.

(10)

Lube oil —

stored in 5 gal containers
on press. Added as needed.

oil is continuously run
from machinery collect's in
container at bottom

emptied weekly or so.

collection drum at each press.

full drums to Long-Shul

for Safety Kleen.

(11)

Plastic room — all materials are recycled.

Anti-freeze — waste coolant used to cool UV lights (used for drying inks)

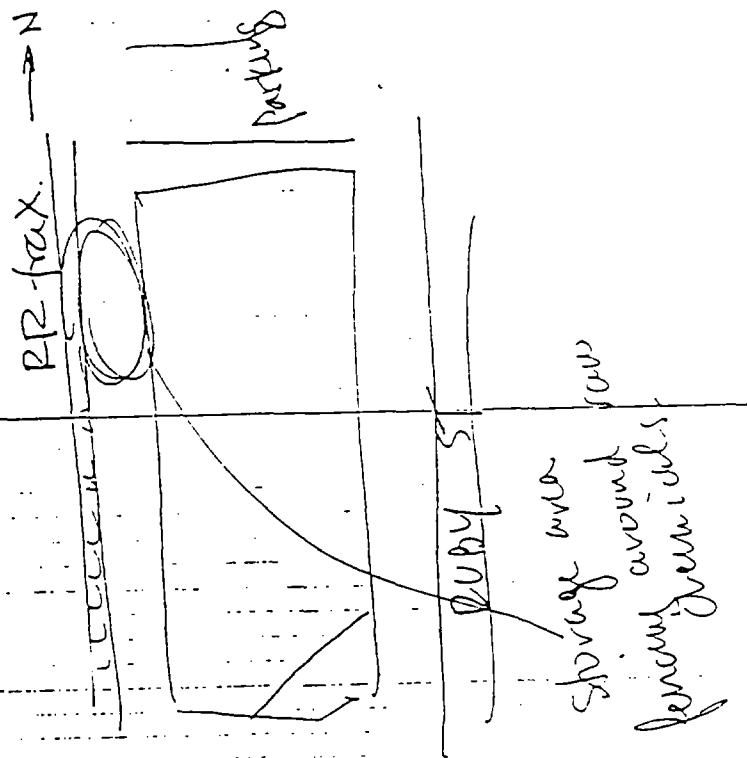
Not regularly generated.

put into drums at press - moved to back ~~SWING~~

Safety Veen.

(12)

SECURITY
two 12: hour shifts
open 6 days/wk - not Sunday.
no formal security system
9 doors.



(13)

PERMITS —

Air permit — for all finishing equipment

USTs — fuel oil for boilers. out of service since 1970s.

tanks were filled in November 1991

soil + G.W. sampling done. results @.

Melrose, Pa. — around here is industrial — no residences in immediate vicinity.

(14)

Dynalene + Mylar.

used in drafting processes.

sheet deposited into SS gel

barrels mylar —

sent for recycling to Dupont
in Niles, IL

~4 months — ~~was~~
maybe 1 day/year.

photo 1 + 2

—
 facing North in Press.
 Room at satellite collection
 area for H₂O / F₂O₂ waste.
 At Press 9.

photo 3

facing South in Press.
 Room at satellite collection
 for water + fire oil waste
 Press 11

photo 4

3 facing North in Press.
 Room, Press 9. Paper collection
 bin for waste paper.

photo 5

4 facing North in Press.
 Room, Press 10. Lubricating
 oil collection at base of Press.

(10)

photo 8+7 facing West
in raw materials storage bldg.
Dome of GN coating waste.

photo 8 facing SW
in Distribution Room, dome
of still bottom

photo 9 facing N
~~in Distribution Room at~~

photo 9a facing W in Press
Chemical storage room. Press
wastings, satellite collection +
down awaiting offer to King Suro

photo 10a facing N at The
Pad, all barrel waste
stored here pending removal
by safety team.

(17)

photo 12 " facing East on
hill pad. overpack drums of unknown
wastes.

photo 13 12 facing West in
paper shipping room. Paper
waste is collected either in
cyclone or on carts to be
shipped to central collection.

photo 14 13 facing North in
Funding Room. Satellite
collection for Waste Glue.

photo 15 14 facing ~~North~~ West in
Funding Room. Banking Apparatus

photo 16 15 facing Southwest
balled paper awaiting
resale.

photo 17 16 facing West in
bldg's, Dress room at Ink Waste
Storage collection area.

(19)

The Pad — $125' \times 12'$
approximately 300 storage potential.